

Federal Defenders
OF NEW YORK, INC.

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

August 16, 2021

By ECF and by e-mail

Honorable Laura Taylor Swain
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: *United States v. Martinez-Aguilar, et al.*, 20 Cr. 333 (LTS)

Dear Chief Judge Swain:

I represent defendant Sebastian Ramos in the above-captioned case.

I write on consent (Pretrial Services Officer Dayshawn Bostic) to respectfully request that the Court expand Mr. Ramos's travel restrictions to include the Eastern District of Pennsylvania. Mr. Ramos will need to travel there on a weekly basis for work. The Court has previously approved Mr. Ramos's travel to Pennsylvania for this purpose, and Mr. Ramos has been otherwise wholly compliant with all the conditions of release. The Government – per Assistant U.S. Attorney Jarrod Schaefer – defers to Pretrial Services.

Thank you for your consideration of this request.

The modification request is granted.
Docket entry No. 99 is resolved.
SO ORDERED.
8/17/2021
/s/ Laura Taylor Swain, Chief USDJ

Respectfully submitted,

/s/

Martin S. Cohen
Ass't Federal Defender
(212) 417-8737

cc: Jarrod Schaeffer and Rushmi Bhaskaran Esqs., by ECF
U.S. Pretrial Services Officer Dayshawn Bostic, by e-mail